



U.S. Department of Justice

950 Pennsylvania Avenue NW
Washington, D.C. 20530

September 27, 2024

VIA CM/ECF

Hon. Dale E. Ho
U.S. District Judge
U.S. District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *United States v. M/Y Amadea*, No. 23-cv-9304 (DEH)

Dear Judge Ho,

The Government respectfully submits this letter motion requesting permanent sealing of its forthcoming Opposition Brief to a witness's motion to quash deposition subpoena. While the Government's Opposition Brief will not list witness names, it will provide enough identifying details that a knowledgeable third-party might be able to infer the identities of two witnesses in this case. The Court has expressed a willingness to shield witness identity in this case, particularly when witnesses express concern for their livelihood or safety if their identities were made public. See, e.g., ECF Nos. 122, 227. Accordingly, the Government requests that its forthcoming Opposition Brief be permanently sealed to protect the identities of the two witnesses discussed therein.

APPLICATION GRANTED. The presumption of public access to judicial documents is overcome here. See *Walker v. City of New York*, No. 15 Civ. 500, 2017 WL 2799159, at *6 (E.D.N.Y. June 27, 2017) (witness safety is "a higher value" justifying redaction).

The Clerk of the Court is respectfully directed to place ECF No. 268 under seal, and to close ECF No. 267.
SO ORDERED.

Respectfully Submitted,

DAMIAN WILLIAMS
United States Attorney
Southern District of New York
U.S. Department of Justice

By: /s/ Jennifer Jude
JENNIFER JUDE
DOMINIKA TARCYNSKA
Assistant U.S. Attorneys
Southern District of New York

DALE E. HO
United States District Judge
Dated: September 30, 2024
New York, New York

MARGARET A. MOESER
Acting Chief
Money Laundering and Asset Recovery
Section, Criminal Division
U.S. Department of Justice

By: /s/ Joshua L. Sohn
JOSHUA L. SOHN
D. HUNTER SMITH
Trial Attorneys
Money Laundering and Asset Recovery
Section

JENNIFER KENNEDY GELLIE
Executive Deputy Chief
Counterintelligence and Export Control
Section, National Security Division
U.S. Department of Justice

By: /s/ Yifei Zheng
YIFEI ZHENG
Trial Attorney
Counterintelligence and Export Control
Section

cc: Claimants' counsel (by ECF)